

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL
OFFICE OF AIR QUALITY**

**Pike Lumber Company, Inc.
719 Front Street
Akron, Indiana 46910**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit Renewal No.: F049-12738-00007	
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 12, 2001 Expiration Date: October 12, 2006

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	6
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
A.5	Prior Permit Conditions	
SECTION B	GENERAL CONDITIONS	8
B.1	Permit No Defense [IC 13]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Permit Term [326 IAC 2-8-4(2)]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]	
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.13	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.14	Emergency Provisions [326 IAC 2-8-12]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]	
B.19	Operational Flexibility [326 IAC 2-8-15]	
B.20	Permit Revision Requirement [326 IAC 2-8-11.1]	
B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]	
SECTION C	SOURCE OPERATION CONDITIONS	18
Emissions Limitations and Standards [326 IAC 2-8-4(1)]		
C.1	Overall Source Limit [326 IAC 2-8]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Operation of Equipment [326 IAC 2-8-5(a)(4)]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-8-4(3)]		
C.9	Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]		
C.10	Compliance Requirements [326 IAC 2-1.1-11]	

TABLE OF CONTENTS (Continued)

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS 25

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (326 IAC 6-2-4)

D.1.2 PSD Minor Limit [326 IAC 2-2] [40CFR 52.21] and FESOP Limits [326 IAC 2-8-4]

D.1.3 Preventative Maintenance

Compliance Determination Requirements

D.1.4 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.1.5 Cyclone Inspections

D.1.6 Cyclone Failure Detection

D.1.7 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.8 Record Keeping Requirements

D.1.9 Reporting

SECTION D.2 FACILITY OPERATION CONDITIONS 27

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-16]

D.2.2 Reporting Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS 28

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

D.3.2 FESOP PM10 Limit [326 IAC 2-8-4] and PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

TABLE OF CONTENTS (Continued)

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)][326 IAC 2-8-16]	
D.3.4 Record Keeping Requirements	
D.3.5 Reporting	
SECTION D.4 FACILITY OPERATION CONDITIONS	30
Emission Limitations and Standards [326 IAC 2-8-4(1)]	
D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]	
D.4.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]	
D.4.3 FESOP PM10 Limit [326 IAC 2-8-4]	
D.4.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]	
Compliance Determination Requirements	
D.4.5 Particulate Matter (PM)	
D.4.6 Testing Requirements [326 IAC 2-8-5(2)(1),(4)] [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]	
D.4.7 Visible Emissions Notations	
D.4.8 Cyclone Inspections	
D.4.9 Cyclone Failure Detection	
Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]	
D.4.10 Record Keeping Requirements	
SECTION D.5 FACILITY OPERATION CONDITIONS	32
Emission Limitations and Standards [326 IAC 2-8-4(1)]	
D.5.1 Particulate Matter (PM) [326 IAC 6-3-2]	
D.5.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]	
D.5.3 FESOP PM10 Limit [326 IAC 2-8-4]	
D.5.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]	
Compliance Determination Requirements	
D.5.5 Particulate Matter (PM)	
Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]	
D.5.6 Visible Emissions Notations	
D.5.7 Cyclone Inspections	
D.5.8 Cyclone Failure Detection	
Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]	
D.5.9 Record Keeping Requirements	
SECTION D.6 FACILITY OPERATION CONDITIONS	34
Emission Limitations and Standards [326 IAC 2-8-4(1)]	
D.6.1 Particulate Matter (PM) [326 IAC 6-3-2]	
D.6.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]	
D.6.3 FESOP PM10 Limit [326 IAC 2-8-4]	
D.6.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]	
Compliance Determination Requirements	
D.6.5 Particulate Matter (PM)	

TABLE OF CONTENTS (Continued)

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.6.6 Visible Emissions Notations

D.6.7 Cyclone Inspections

D.6.8 Cyclone Failure Detection

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.6.9 Record Keeping Requirements

SECTION D.7 FACILITY OPERATION CONDITIONS 36

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.7.1 Volatile Organic Compounds (VOC)

D.7.2 Particulate Matter (PM) [326 IAC 6-3-2]

Federally Enforceable State Operating Permit (FSEOP) Certification	38
FESOP Emergency Occurrence Report	39
Natural Gas Fired Boiler Certification	41
FESOP Quarterly Report	42 and 43
FESOP Quarterly Deviation and Compliance Monitoring Report	44

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary hardwood lumber sawing operation.

Authorized individual:	James H. Mulligan, President
Source Address:	719 Front Street, Akron, Indiana 46910
Mailing Address:	P.O. Box 247, Akron, Indiana 46910
SIC Code:	2421
Source Location Status:	Fulton
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor under PSD Rules;
	Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) 20.9 million British thermal units per hour wood-fired boiler, identified as EU-2.1, installed in 1988. The boiler is equipped with multiple-cyclone particulate control. The boiler exhausts at one (1) stack, identified as S-2.1.
- (b) One (1) 25.1 million British thermal units per hour natural gas-fired standby boiler, identified as EU-2.2, installed in 1988. The boiler has no emission controls, and exhausts at one (1) stack, identified as S-2.2.
- (c) Wood sawing operations with a maximum operating capacity of 25.7 tons of wood per hour, housed in an enclosed building which is a cement block structure with no building ventilation system.
- (d) A wood planing operation, installed in 1986, with cyclone particulate control with a minimum efficiency of 80 percent. The planer exhausts at one (1) vent, identified as V-34.
- (e) One (1) fuel bin with a maximum throughput of 8.9 tons per hour and with cyclone control, installed in 1971.
- (f) One (1) storage silo with a maximum throughput of 8.9 tons per hour and with cyclone control, installed in 1983.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operation that do not exceed 145 gallons per 12 months except if subject to 326 IAC 20-6;

- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (d) Paved and unpaved roads and parking lots with public access; and
- (e) Other categories with emissions below insignificant thresholds:
 - (1) One (1) fuel pile;
 - (2) One (1) shavings bin (planer);
 - (3) One (1) 14,500 gallon diesel storage tank;
 - (4) One (1) 15,000 gallon diesel storage tank;
 - (5) One (1) debarker;
 - (6) One (1) sawmill chipper;
 - (7) Greenchain/trimmings;
 - (8) One (1) greenchain hog;
 - (9) One (1) straight line rip saw;
 - (10) Drying kilns 1-29;
 - (11) Predrying;
 - (12) One (1) dip tank;

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or,

for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the

shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
Northern Regional Office Telephone: 1-800-753-5519
Facsimile No.: 219-245-4877

Failure to notify IDEM, OAQ and the Northern Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD), emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required by the current FESOP shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted a written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

- (1) This condition;
- (2) The Compliance Determination Requirements in Section D of this permit;

- (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared immediately after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) 20.9 million British thermal units per hour wood-fired boiler, identified as EU-2.1, installed in 1988. The boiler is equipped with multiple-cyclone particulate control. The boiler exhausts at one (1) stack, identified as S-2.1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations from Sources of Indirect Heating), the particulate matter emissions from Boiler EU-2.1 shall be limited to 0.40 pounds per million British thermal units heat input.

This limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

where P_t = emission rate limit (lbs/MMBtu;

Q = total capacity rating in million Btu per hour heat input (MMBtu/hour = 46 MMBtu/hr)

D.1.2 PSD Minor Limit [326 IAC 2-2] [40CFR 52.21] and FESOP Limits [326 IAC 2-8-4]

- (a) The annual wood fuel usage in Boiler EU-2.1 is limited to 14,235 tons per 12 consecutive month period.
- (b) The emissions of carbon monoxide while burning wood shall not exceed 13.6 pounds per ton of wood. These limits are equivalent to 96.8 tons per year of carbon monoxide.
- (c) The emissions of particulate matter, while burning wood, shall not exceed 8.8 pounds per ton of wood burned. These limits are equivalent to 12.5 tons per year of particulate.
- (d) The emissions of PM10, while burning wood, shall not exceed 7.9 pounds per ton of wood burned. These limits are equivalent to 11.2 tons per year of PM10..

These limits make 326 IAC 2-2 and 326 IAC 2-8-4 not applicable.

D.1.3 Preventative Maintenance

A Preventative Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.4 Particulate Matter (PM)

In order to comply with D.1.1 and D.1.2 (c) and (d), the cyclones for particulate control shall be in operation and control emissions from the boiler at all times that the boiler is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.1.5 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone controlling the wood-fired Boiler EU-2.1 when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.1.6 Cyclone Failure Detection

In the event that cyclone failure has been observed: Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.7 Visible Emissions Notations

- (a) Visible emission notations of the wood-fired boiler #1 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain daily records at the source of the amount of wood fuel input for Boiler EU-2.1. The records shall be complete and sufficient to establish compliance with the CO emission limits established in this permit.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.5 and the dates the vents are redirected.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the wood-fired boiler # 1 stack exhaust.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

D.1.9 Reporting

A quarterly summary to document compliance with operation condition number D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (b) One (1) 25.1 million British thermal units per hour natural gas-fired standby boiler, identified as EU-2.2, installed in 1988. The boiler has no emission controls, and exhausts at one (1) stack, identified as S-2.2 which is a cement block structure with no building ventilation system.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (d) (Particulate emission limitations for sources of indirect heating), particulate emissions from the 25.1 million British thermal units per hour standby natural gas-fired boiler EU-2.2 shall be limited to 0.40 pounds of particulate matter per million British thermal units heat input.

This limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

where P_t = emission rate limit (lbs/MMBtu);

Q = total capacity rating in million Btu per hour heat input (MMBtu/hour = 46 MMBtu/hr)

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.2 Reporting Requirements

A quarterly natural gas fired boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (c) Wood sawing operations with a maximum operating capacity of 25.7 tons of wood per hour, housed in an enclosed building which is a cement block structure with no building ventilation system.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the wood sawing operations shall not exceed 36.1 pounds per hour when operating at a process weight rate of 25.7 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by the use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

The source is in compliance with this rule at maximum production rate without any add-on controls.

D.3.2 FESOP PM10 Limit [326 IAC 2-8-4] and PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) Pursuant to 326 IAC 2-8-4 (FESOP), the amount of wood processed in the wood saw operations shall be limited to a maximum of 225,000 tons of wood per twelve (12) consecutive months and emissions of PM10 to less than 0.20 pounds per ton of wood processed. These limits are equivalent to 22.5 tons per year of PM10. Thus the source is limited to a potential to emit of PM10 less than 100 tons per year which will render 326 IAC 2-7 (Part 70 Permit Program) not applicable.
- (b) Limit emissions of PM to less than 0.35 pounds per ton of wood processed. These limits are equivalent to 39.4 tons per year of PM. Thus, the source is limited to a potential to emit of PM less than 250 tons per year which will render 326 IAC 2-2 (PSD Rules) not applicable.

D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.2 (a) and (b), the Permittee shall maintain records of the amount of wood processed in the wood sawing operations.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.5 Reporting

A quarterly summary to document compliance with operation conditions numbers D.3.2 (a) and (b) shall be submitted to the address listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (d) A wood planing operation, installed in 1986, with cyclone particulate control with a minimum efficiency of 80 percent. The planer exhausts at one (1) vent, identified as V-34.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 18.8 pounds per hour when operating at a process weight rate of 9.7 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.4.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The allowable PM emissions from this wood planing operation shall be limited to 51 tons per year and 11.6 pounds per hour. Thus, the source is limited to a potential to emit of PM less than 250 tons per year which will render 326 IAC 2-2 (PSD Rules) not applicable.

D.4.3 FESOP PM10 Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the allowable PM10 emissions for this wood planing operation shall be limited to 51 tons per year and 11.6 pounds per hour. The source will limit PM10 emissions to less than 100 tons per year which will render 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.4.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.4.5 Particulate Matter (PM)

In order to comply with D.4.1, D.4.2 and D.4.3, the cyclone for PM and PM10 control shall be in operation and control emissions from the wood planing operation at all times that the wood planing operation is in operation.

D.4.6 Testing Requirements [326 IAC 2-8-5(2)(1), (4)][326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, in order to demonstrate compliance with Conditions D.4.1, D.4.2, and D.4.3, the Permittee shall perform PM and PM10 testing utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM10 includes filterable and condensable PM10. Testing shall be conducted in accordance with Section C- Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(2)(1)]

D.4.7 Visible Emissions Notations

- (a) Daily visible emission notations of the wood planing operation cyclone vent exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.4.8 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.4.9 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.4.10 Record Keeping Requirements

- (a) To document compliance with Condition D.4.7, the Permittee shall maintain records of daily visible emission notations of the wood planing operation cyclone vent exhaust.
- (b) To document compliance with Condition D.4.8, the Permittee shall maintain records of the results of the inspections required under Condition D.4.8 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (e) One (1) fuel bin with a maximum throughput rate of 8.9 tons per hour equipped and with cyclone control, installed in 1971.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the fuel bin shall not exceed 17.7 pounds per hour when operating at a process weight rate of 8.9 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.5.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The allowable PM emissions from the fuel bin will be limited to 7.8 tons per year (1.8 lb/hr). Thus, the source's limited potential to emit PM is less than 250 tons per year which will render 326 IAC 2-2 (PSD Rules) not applicable.

D.5.3 FESOP PM₁₀ Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the allowable PM₁₀ emissions for the fuel bin will be limited to 4.5 tons per year and 1.0 pounds per hour. Thus, the source's limited potential to emit PM₁₀ is less than 100 tons per year which will render 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.5.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.5.5 Particulate Matter (PM)

In order to comply with D.5.1, D.5.2, and D.5.3, the cyclone for PM control shall be in operation and control emissions from the fuel bin operation at all times that the fuel bin is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.5.6 Visible Emissions Notations

- (a) Visible emission notations of the fuel bin operation cyclone vent exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.5.7 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the fuel bin operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.5.8 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.5.9 Record Keeping Requirements

- (a) To document compliance with Condition D.5.6, the Permittee shall maintain records of daily visible emission notations of the wood planing operation cyclone vent exhaust.
- (b) To document compliance with Condition D.5.7, the Permittee shall maintain records of the results of the inspections required under Condition D.5.7 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (f) One (1) storage silo with a maximum throughput rate of 8.9 tons per hour equipped and with cyclone control, installed in 1983.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.6.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the storage silo shall not exceed 17.7 pounds per hour when operating at a process weight rate of 8.9 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.6.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The allowable PM emissions from the storage silo will be limited to 7.8 tons per year and 1.8 pounds per hour. Thus, the source's limited potential to emit PM is less than 250 tons per year which will render 326 IAC 2-2 (PSD Rules) not applicable.

D.6.3 FESOP PM₁₀ Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the allowable PM₁₀ emissions from the storage silo will be limited to 4.5 tons per year and 1.0 pounds per hour. Thus, the source's limited potential to emit PM₁₀ is less than 100 tons per year which will render 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.6.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.6.5 Particulate Matter (PM)

In order to comply with D.6.1, D.6.2, and D.6.3, the cyclone for PM control shall be in operation and control emissions from the storage silo operation at all times that the storage silo is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.6.6 Visible Emissions Notations

- (a) Visible emission notations of the storage silo operation cyclone vent exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.6.7 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the storage silo operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.6.8 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.6.9 Record Keeping Requirements

- (a) To document compliance with Condition D.6.6, the Permittee shall maintain records of daily visible emission notations of the storage silo operation cyclone vent exhaust.
- (b) To document compliance with Condition D.6.7, the Permittee shall maintain records of the results of the inspections required under Condition D.6.7 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.7

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activities (as defined in 326 IAC 2-7-1(21)):

- (a) Degreasing operation that do not exceed 145 gallons per 12 months except if subject to 326 IAC 20-6;
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (d) Paved and unpaved roads and parking lots with public access; and
- (e) Other categories with emissions below insignificant thresholds:
 - (1) One (1) fuel pile;
 - (2) One (1) shavings bin (planer);
 - (3) One (1) 14,500 gallon diesel storage tank;
 - (4) One (1) 15,000 gallon diesel storage tank;
 - (5) One (1) debarker;
 - (6) One (1) sawmill chipper;
 - (7) Greenchain/trimmings;
 - (8) One (1) greenchain hog;
 - (9) One (1) straight line rip saw;
 - (10) Drying kilns 1-29;
 - (11) Predrying;
 - (12) One (1) dip tank;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.7.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;

- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.7.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the woodworking operations shall not exceed 0.88 pounds per hour each, with a maximum process throughput rate of 0.10 tons per hour each, based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Pike Lumber Company, Inc.
Source Address: 719 Front Street, Akron, Indiana 46910
Mailing Address: P.O. Box 247, Akron, Indiana 46910
FESOP No.: F 049-12738-00007

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Pike Lumber Company, Inc.
Source Address: 719 Front Street, Akron, Indiana 46910
Mailing Address: P.O. Box 247, Akron, Indiana 46910
FESOP No.: F 049-12738-00007

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Pike Lumber Company, Inc.
Source Address: 719 Front Street, Akron, Indiana 46910
Mailing Address: P.O. Box 247, Akron, Indiana 46910
FESOP No.: F 049-12738-00007

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel
From To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

FESOP Quarterly Report

Source Name: Pike Lumber Company, Inc.
Source Address: 719 Front Street, Akron, Indiana 46910
Mailing Address: P.O. Box 247, Akron, Indiana 46910
FESOP No.: F049-12738-00007
Facility: Boiler EU-2.1
Parameter: PM, PM10, CO
Limit: Limit wood fuel usage in Boiler EU-2.1 to 14,235 tons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

FESOP Quarterly Report

Source Name: Pike Lumber Company, Inc.
Source Address: 719 Front Street, Akron, Indiana 46910
Mailing Address: P.O. Box 247, Akron, Indiana 46910
FESOP No.: F049-12738-00007
Facility: Sawing operation
Parameter: PM, PM10
Limit: Limit wood processed to less than 225,000 tons per 12 consecutive months

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Pike Lumber Company, Inc.
Source Address: 719 Front Street, Akron, Indiana 46910
Mailing Address: P.O. Box 247, Akron, Indiana 46910
FESOP No.: F 049-12738-00007

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: Pike Lumber Company, Inc.
Source Location: 719 Front Street, Akron, Indiana 46910
County: Fulton
SIC Code: 2421
Operation Permit No.: F049-12738-00007
Permit Reviewer: ERG/CB

On August 29, 2001, the Office of Air Quality (OAQ) had a notice published in the Rochester Sentinel in Rochester, Indiana, stating that Pike Lumber Company, Inc., had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a hardwood lumber sawing operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, IDEM, OAQ has made the following corrections to the permit:

1. The reference to 2 conditions in D.4.10 are incorrect. The correction is as follows:

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.4.10 Record Keeping Requirements

- (a) To document compliance with Condition D.4.76, the Permittee shall maintain records of daily visible emission notations of the wood planing operation cyclone vent exhaust.
 - (b) To document compliance with Condition D.4.87, the Permittee shall maintain records of the results of the inspections required under Condition D.4.87 and the dates the vents are redirected.
2. Cyclone inspections are required in Section D.1, but record keeping of the inspection results was inadvertently left out of the permit. Therefore, the following change was made to Condition D.1.8:

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain daily records at the source of the amount of wood fuel input for Boiler EU-2.1. The records shall be complete and sufficient to establish compliance with the CO emission limits established in this permit.

- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.5 and the dates the vents are redirected.**
- (~~b~~c) To document compliance with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the wood-fired boiler # 1 stack exhaust.**
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.**

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: Pike Lumber Company, Inc.
Source Location: 719 Front Street, Akron, Indiana 46910
County: Fulton
SIC Code: 2421
Operation Permit No.: F049-12738-00007
Permit Reviewer: ERG/CB

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Pike Lumber Company, Inc. relating to the operation of hardwood lumber sawmill operations.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) 20.9 million British thermal units per hour wood-fired boiler, identified as EU-2.1, installed in 1988. The boiler is equipped with multiple-cyclone particulate control. The boiler exhausts at one (1) stack, identified as S-2.1.
- (b) One (1) 25.1 million British thermal units per hour natural gas-fired standby boiler, identified as EU-2.2, installed in 1988. The boiler has no emission controls, and exhausts at one (1) stack, identified as S-2.2.
- (c) Wood sawing operations with maximum operating capacity of 25.7 tons of wood per hour, housed in an enclosed building which is a cement block structure with no building ventilation system.
- (d) A wood planing operation, installed in 1986, with cyclone particulate control with a minimum efficiency of 80 percent. The planer exhausts at one (1) vent, identified as V-34.
- (e) One (1) fuel bin with a maximum throughput of 8.9 tons per hour and with cyclone control, installed in 1971.
- (f) One (1) storage silo with a maximum throughput of 8.9 tons per hour and with cyclone, control, installed in 1983.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this renewal review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new emission units during this renewal review process.

Insignificant Activities

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operation that do not exceed 145 gallons per 12 months except if subject to 326 IAC 20-6;
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (d) Paved and unpaved roads and parking lots with public access; and
- (e) Other categories with emissions below insignificant thresholds:
 - (1) One (1) fuel pile;
 - (2) One (1) shavings bin (planer);
 - (3) One (1) 14,500 gallon diesel storage tank;
 - (4) One (1) 15,000 gallon diesel storage tank;
 - (5) One (1) debarker;
 - (6) One (1) sawmill chipper;
 - (7) Greenchain/trimmings;
 - (8) One (1) greenchain hog;
 - (9) One (1) straight line rip saw;
 - (10) Drying kilns 1-29;
 - (11) Predrying;
 - (12) One (1) dip tank;

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) F 049-5361-00007, issued on December 12, 1996; and
- (b) OP 25-02-93-00073, issued on February 1, 1993.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP renewal application for the purposes of this review was received in a timely manner on September 21, 2000.

Emission Calculations

Because the permit is a FESOP renewal and no changes have been made at this source since the initial FESOP was issued on December 12, 1996, no new emissions calculations were necessary. The calculations done for the initial FESOP still represent the potential to emit of this source and are provided in Appendix A of this document (4 pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	greater than 435*
PM-10	greater than 379*
SO ₂	0.6
VOC	10.6
CO	greater than 99*
NO _x	21.7

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

* These values were calculated considering a limit on wood fuel usage before controls. Because this table is to reflect uncontrolled, unlimited potential to emit, “greater than” was added to indicate that the uncontrolled, unlimited potential to emit is greater than the value calculated.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 and CO are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit in the past, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source was issued a Federally Enforceable State Operating Permit (FESOP). During this renewal review process, this source agreed to maintain their FESOP status.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1995 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM-10	9
SO ₂	1
VOC	6
CO	17
NO _x	3

Limited Potential to Emit

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Boiler EU-2.1	12.5	11.2	0.5	10.0	96.8	10.7	0.00
Boiler EU-2.2	0.3	0.3	0.1	0.6	2.2	11.0	0.00
Sawmill	39.4	22.5	0.00	0.00	0.00	0.00	0.00
Planer	51	51.0	0.00	0.00	0.00	0.00	0.00
Fuel Bin	7.8	4.5	0.00	0.00	0.00	0.00	0.00
Storage Silo	7.8	4.5	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	5.0	5.0	0.00	0.00	0.00	0.00	0.00
Total	123.8	99.0	0.6	10.6	99.0	21.7	0.00

County Attainment Status

The source is located in Fulton County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Fulton County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) Boiler EU-2.1 and Boiler EU-2.2 are not subject to the New Source Performance Standard, 326 IAC 12 (40 CFR Part 60.40c, Subpart Dc), because the boilers were both installed in August of 1988. The NSPS applies only to those units constructed, modified, or reconstructed after June 9, 1989.

- (b) The 14,500 gallon and 15,000 gallon diesel storage tanks are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb), because the tanks were installed in June of 1979 and May of 1976, respectively. The NSPS applies to those units constructed, modified, or reconstructed after July 23, 1984.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD Rules)

The source will limit PM emissions to less than 250 tons per year and will also limit CO emissions to less than 250 tons per year which will render 326 IAC 2-2 (PSD Rules) not applicable. The source will be in compliance with PM limitation by using the cyclone controls on Boiler EU-2.1, the planer, the fuel bin and the storage silo. The source will be in compliance with the PM and CO limitation by limiting the wood fuel usage in Boiler EU-2.1 to 14,235 tons per 12 consecutive month period. With the limits below, the natural gas boiler EU-2.2 and the sawmill can run at their maximum capacity and the source will emit less than 250 tons per year of PM and CO. Limits are included for the saw mill to limit it to it's maximum capacity and at the appropriate pounds of PM per ton of wood processed. The natural gas boiler EU-2.2 is not specifically limited because AP-42 emission factors were used to determine the potential to emit. The PM and CO emissions will be limited as follows:

Emission Unit	PM Emissions Limit (tons per year)	PM Emissions Limit (lb/hr)	CO Emissions Limit (tons per year)	CO Emissions Limit (lb/ton)
Wood-fired Boiler EU-2.1	12.5	8.8	96.8	13.6
Natural Gas Boiler EU-2.2*	0.3	--	2.2	--
Saw Mill*	39.4	0.35 lb/ton	--	--
Planer operation	51	11.6	--	--
Fuel bin	7.8	1.8	--	--
Storage silo	7.8	1.8	--	--
Total	118.8**	--	99	--

* Emissions at maximum capacity.

** There is an additional 5 tons per year of PM associated with insignificant activities.

326 IAC 2-8-4 (FESOP)

The source will limit PM10 and CO emissions to less than 100 tons per year which will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. The source will be in compliance with the limitation controlling PM10 emissions by using the multiple cyclones controls. The source will be in compliance with the limitation controlling PM10 and CO emissions by limiting the wood fuel usage in Boiler EU-2.1 to 14,235 tons per 12 consecutive month period. The natural gas boiler EU-2.2 and the sawmill operation are not specifically limited with the limits below, the boiler EU-2.2 and the sawmill can run at their maximum capacity and the source will emit less than 100 tons per year of CO and PM10. The PM10 and CO emissions will be limited as follows:

Emission Unit	PM10 Emissions Limits (tons per year)	PM10 Emissions Limits (lb/hr)	CO Emissions (tons per year)	CO Emissions Limit (lb/ton)
Wood-fired Boiler EU-2.1	11.2	7.9	96.8	13.6
Natural Gas Boiler EU-2.2*	0.3	--	2.2	--
Saw Mill*	22.5	0.20 lb/ton wood	--	--
Planer operation	51	11.86	--	--
Fuel bin	4.5	1.0	--	--
Storage silo	4.5	1.0	--	--
Total	94**	--	99	--

* Emissions at maximum capacity.

** There is an additional 5 tons per year of PM associated with insignificant activities.

326 IAC 2-6 (Emission Reporting)

This source is located in Fulton County and is not subject to 326 IAC 2-6 (Emission Reporting) because this permit limits the emissions of PM10 and CO to less than 100 tons per year.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from Boilers EU-2.1 and EU-2.2 shall be limited to 0.40 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

where P_t = pounds of particulate matter emitted per million Btu (lb/MMBtu) of heat input

Q = total source maximum operating capacity in million Btu per hour (MMBtu/hr) of heat input (46 MMBtu/hr)

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the fuel bin, storage silo, sawmill, and planer operations shall be limited as follows:

Emission Unit Description	Maximum throughput (tons/hour)	Allowable Emissions (lb/hour)
Fuel Bin	8.9	17.7
Storage Silo	8.9	17.7
Sawmill	25.7	36.1
Planer	9.7	18.8

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The cyclone shall be in operation at all times the fuel bin, storage silo, sawmill, or planer is in operation, in order to comply with this limit.

326 IAC 8-3-2 (Organic Solvent Degreasing Operations: Cold Cleaner Operation)

Pursuant to 326 IAC 8-3-2 (Organic Solvent Degreasing Operations: Cold Cleaner Operation), the owner or operator of a cold cleaning facility shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) second, or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operating requirements; and
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The cold cleaning facility is not subject to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control) because this source is located in Fulton County and the cold cleaning facility was constructed in 1983, prior to the applicability date of 326 IAC 8-3-5.

Testing Requirements

- (a) There are no testing requirements applicable to EU-2.1, the fuel bin, or the silo because the potential to emit PM, the major pollutant, before controls is not greater than 40% of the facility's total potential to emit before controls. Additionally, there is no evidence that EU-2.1, the fuel bin, or the silo are out of compliance with any applicable limitations.
- (b) There are no testing requirements for the wood sawing operation or EU-2.2 because the FESOP limit is based on the sawmill and EU-2.2 operating at their maximum design throughput. Therefore, the saw mill and EU-2.2 could only be out of compliance if the process was modified which would require a permit modification. Furthermore, the wood sawing operation is a fugitive emission point that does not have a stack that would allow for emissions testing.

- (c) Testing is required for the planer because the planer's potential to emit PM and PM10, the major pollutants, before controls are greater than 40% of the facility's total potential to emit before controls.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The planer, fuel bin, storage silo, and Boiler EU-2.1 have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the Boiler EU-2.1, wood planer, fuel bin and storage silo exhaust vents shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (b) The multiple-cyclone particulate control device shall be properly maintained and operated in accordance with the manufacturer's specifications. Inspections shall be performed each calendar quarter of the multiple-cyclone device inspections shall also be performed with 3 months of redirecting vents to the atmosphere and every 3 months thereafter. The compliance response plan for this unit shall contain troubleshooting contingency and response steps for abnormal operation.

These monitoring conditions are necessary because the cyclones for the wood-fired Boiler EU-2.1, the planer, the fuel bin and the storage silo must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) FESOP Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act.

Conclusion

The operation of this hardwood lumber sawmill operation shall be subject to the conditions of the attached draft Renewal FESOP No.: F049-12738-00007.

PIKE LUMBER EMISSIONS CALCULATIONS

MMCF = Millions of cubic feet
lb = pounds

PM

Emission Unit	Unit ID	Process Rate		Emission Factor	Uncontrolled Maximum Emissions*** (Tons/Year)	Control System Efficiency (%)	Controlled Maximum Emissions (Tons/year)	Actual Emissions (Tons/year)
		Allowable Maximum	Actual					
Wood Boiler	EU-2.1	14235 tons / 365 days	1.03 Tons/hour	8.8 lb/Ton	62.6	80	12.5	7.6
Natural Gas Boiler	EU-2.2	0.025 MMCF/hour	0.008 MMCF/hour	3.00 lb/MMCF	0.33	0	0.3	0
Sawmill *	EU-20.1.1	25.7 tons/hour	19.6 Tons/hour	0.35 lb/Ton	39.4	0	39.4	4.2
Planer	EU-20.3	9.7 tons/hour	4.2 Tons/hour	6.0 lb/Ton **	254.9	80	51	6.7
Fuel Bin	EU-3.1	8.9 tons/hour	3.2 Tons/hour	1.00 lb/Ton	39	80	7.8	0.98
Storage Silo	EU-3.2	8.9 tons/hour	3.2 Tons/hour	1.00 lb/Ton	39	80	7.8	0.7
Total					436.23	80	118.8	20.18

* Denotes Fugitive Emissions Source

** Approximately 15% by weight of lumber processed becomes waste. Pike Lumber estimates that, conservatively, 2% by weight of the waste becomes PM. In order to assume "worst case" PM-10 emissions, it was assumed that all PM emissions are also PM-10. Pike Lumber assumes that actual emissions are less than those calculated, but wishes to present conservative estimates.

***Emissions in this table are estimated based on emission factors. Emissions in the Limited PTE table for PM are based on 326 IAC 6-3.

PM-10

Emission Unit	Unit ID	Process Rate		Emission Factor	Uncontrolled Maximum Emissions (Tons/Year)	Control System Efficiency (%)	Controlled Maximum Emissions (Tons/year)	Actual Emissions (Tons/year)
		Allowable Maximum	Actual					
Wood Boiler	EU-2.1	14235 tons / 365 days	1.03 Tons/hour	7.90 lb/Ton	56.2	80	11.2	6.8
Natural Gas Boiler	EU-2.2	0.025 MMCF/hour	0.008 MMCF/hour	3.00 lb/MMCF	0.33	0	0.3	0
Sawmill *	EU-20.1.1	25.7 tons/hour	9.6 Tons/hour	0.20 lb/Ton	22.5	0	22.5	2.4
Planer	EU-20.3	9.7 tons/hour	4.2 Tons/hour	6.0 lb/Ton **	254.9	80	51	6.7
Fuel Bin	EU-3.1	8.9 tons/hour	3.2 Tons/hour	0.58 lb/Ton	22.6	80	4.5	0.6
Storage Silo	EU-3.2	8.9 tons/hour	3.2 Tons/hour	0.58 lb/Ton	22.5	80	4.5	0.4
Total					379.03		94	16.9

* Denotes Fugitive Emissions Source

** Approximately 15% by weight of lumber processed becomes waste. Pike Lumber estimates that, conservatively,

2% by weight of the waste becomes PM. In order to assume "worst case" PM-10 emissions, it was assumed that all PM emissions are also PM-10. Pike Lumber assumes that actual emissions are less than those calculated, but wishes to present conservative estimates.

SO₂

Emission Unit	Unit ID	Process Rate		Emission Factor	Uncontrolled Maximum Emissions (Tons/Year)	Control System Efficiency (%)	Controlled Maximum Emissions (Tons/year)	Actual Emissions (Tons/year)
		Allowable Maximum	Actual					
Wood Boiler	EU-2.1	14235 tons / 365 days	1.03 Tons/hour	0.075 lb/ton	0.53	0	0.5	0.34
Natural Gas Boiler	EU-2.2	0.025 MMCF/hour	0.008 MMCF/hour	0.6 lb/MMCF	0.07	0	0.1	0
Total					0.6		0.6	0.34

NO_x

Emission Unit	Unit ID	Process Rate		Emission Factor	Uncontrolled Maximum Emissions (Tons/Year)	Control System Efficiency (%)	Controlled Maximum Emissions (Tons/year)	Actual Emissions (Tons/year)
		Allowable Maximum	Actual					
Wood Boiler	EU-2.1	14235 tons / 365 days	1.03 Tons/hour	1.5 lb/ton	10.71	0	10.7	6.8
Natural Gas Boiler	EU-2.2	0.025 MMCF/hour	0.008 MMCF/hour	100.0 lb/MMCF	10.95	0	11	0.1
Total					21.66		21.7	6.9

VOC

Emission Unit	Unit ID	Process Rate		Emission Factor	Uncontrolled Maximum Emissions (Tons/Year)	Control System Efficiency (%)	Controlled Maximum Emissions (Tons/year)	Actual Emissions (Tons/year)
		Allowable Maximum	Actual					
Wood Boiler	EU-2.1	14235 tons / 365 days	1.03 Tons/hour	1.40 lb/Ton	10	0	10	6.1
Natural Gas Boiler	EU-2.2	0.025 MMCF/hour	0.008 MMCF/hour	5.30 lb/MMCF	0.58	0	0.6	0
Total					10.58		10.6	6.1

CO

Emission Unit	Unit ID	Process Rate		Emission Factor	Uncontrolled Maximum Emissions (Tons/Year)	Control System Efficiency (%)	Controlled Maximum Emissions (Tons/year)	Actual Emissions (Tons/year)
		Allowable Maximum	Actual					
Wood Boiler	EU-2.1	14235 tons / 365 days	1.03 Tons/hour	13.6 lb/ton	96.8	0	96.8	61.4
Natural Gas Boiler	EU-2.2	0.025 MMCF/hour	0.008 MMCF/hour	20.00 lb/MMCF	2.2	0	2.2	0.0
Total					99		99	61.4